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June 8, 2022

**VIA ECF**

Honorable Analisa Torres  
United States District Judge  
Southern District of New York  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Re: *Lynne Freeman v. Tracy Deebs-Elkenaney et. al.*, 22 Civ 2435 (AT)

Dear Judge Torres:

We represent defendants Tracy Deebs-Elkenaney p/k/a Tracy Wolff, Entangled Publishing, LLC, Holtzbrink Publishers, LLC d/b/a Macmillan, and Universal City Studios, LLC in the above-captioned action. We write jointly with plaintiff Lynne Freeman and defendants Emily Sylvan Kim, Prospect Agency, LLC, and Crazy Maple Studio, Inc. to submit the revised proposed Case Management Plan and Scheduling Order according to your Order dated June 1, 2022 [[ECF No. 29](#)]. The parties calculated the start date of the 120 days of fact discovery based on the original defendants' June 27, 2022 deadline to answer the initial complaint. Reasons for this calculation include, but are not limited to, the fact that Defendant Crazy Maple Studio, Inc. ("Crazy Maple Studio") was added as a party in the First Amended Complaint ("FAC") filed on May 23, 2022, and it accepted service of the FAC on June 2, 2022. Counsel for Crazy Maple Studio needs time to become familiar with the facts of the matter before commencing discovery. Pursuant to Fed. R. of Civ P. Rule 26(a)(1)(D) pertaining to parties served after the Rule 26(f) conference, we also modified slightly the time within which Crazy Maple Studio has to serve its initial disclosures.

For the Court's convenience, a Word and PDF version of the parties' Case Management Plan along with a courtesy copy of this letter has been e-mailed to Chambers.

We thank the Court for its time and attention to this matter.

Sincerely,

Nancy E. Wolff, Esq.

A handwritten signature in cursive script that reads "Nancy E. Wolff".

cc: All counsel of record (via ECF)